

## **REMARKS**

In the Office Action, claims 17-24 were withdrawn from consideration, and claims 1-16, 25-32 were rejected. By this Reply and Amendment, claims 1, 10, 14, 25, 27 and 32 have been amended; and claims 1-16, 25-32 remain pending in the present application. The claim amendments are fully supported in the written description and figures of the specification.

Claims 1, 2, 4, 5, 8, 9, 14 and 25-32 were rejected under 35 USC 102(b) as anticipated by the Moore reference, US Patent No.: 6,148,925. This rejection is respectfully traversed; however independent claims 1, 10, 14, 25, 27 and 32 have been amended to clarify aspects of the claim language.

The Moore reference is discussed in the BACKGROUND section of the present application as an example of a system in which cable is fed into a conduit while the conduit is suspended in a well. As discussed in the BACKGROUND section, this type of system does not provide uniform support of the cable because the buckling of the cable is not uniform.

Turning to the actual Moore reference, a downhole wireline system is described in which a tubing is inserted into a substantially vertical passageway formed by a wellbore, and a weight is used to pull a conductor downwardly through the tubing. (See column 2, lines 1-11). The methodology uses coiled tubing "manufactured by conventional techniques without any conductors in it." The tubing is lowered in a conventional matter into an underground well or other vertical passageway. The conductor is then inserted into the tubing "and allowed to fall by gravity through the tubing." The weight can be connected to the leading end of the conductor to pull the conductor straight and to cause the conductor to fall to the tubing bottom. (See column 4, lines 65-67 and column 5, lines 1-9). Thus, the Moore reference describes a conventional system of the type that feeds the conductor down through a tubing already positioned in a wellbore. As described in the BACKGROUND of the present application, this approach does not provide uniform support of the cable.

Accordingly, the Moore reference fails to describe or suggest elements of the presently pending claims. For example, the Moore reference does not disclose or suggest a cable inserted into a conduit, "wherein the cable is uniformly supported along the length of the conduit" as recited in amended, independent claim 1. Similarly, the Moore reference does not disclose or suggest inserting a second length of cable into the length of conduit and "uniformly supporting the second length of cable along the length of the conduit via contact at the plurality of locations" as recited in amended, independent claim 14. The Moore reference also fails to disclose or suggest rolling a strip of metal to create a tubular material, inserting a length of cable into the tubular material, and controlling the positioning of a plurality of contact locations "to provide uniform support of the length of cable along the tubular material when the tubular material is placed in a generally vertical orientation" as recited in amended, independent claim 25. The Moore reference also fails to describe or suggest inserting a cable into a conduit "prior to deploying the conduit into a well" in combination with forming contact between the cable and the conduit "to support the cable in the conduit" as recited in amended, independent claim 27. The Moore reference further fails to disclose or suggest a cable arranged in a conduit "to create contact between the cable and the conduit in a manner that provides uniform support of the cable along the length of the conduit" as recited in amended, independent claim 32. Accordingly, the Moore reference fails to disclose or suggest elements of the subject claims.

Claims 2, 4, 5, 8, 9, 26 and 28-31 ultimately depend from one of the independent claims discussed above. These dependent claims are patentable over the cited reference for the reasons discussed above with respect to the independent claims as well as for additional, unique elements found in these dependent claims.

Claim 3 was rejected under 35 USC 103(a) as unpatentable over the Moore reference in view of the Denison et al. reference, US Patent No.: 4,095,865. This rejection is respectfully traversed. However, claim 3 directly depends from amended, independent claim 1 and is patentable over the Moore reference for the reasons discussed above with respect to independent claim 1 as well as for the additional, unique elements found in this dependent claim. The Denison et al. reference provides no additional disclosure that would obviate the deficiencies of the Moore reference.

Claims 6, 7, 10, 12, 13, 15 and 16 were rejected under 35 USC 103(a) as unpatentable over the Moore reference in view of the McHugh reference, US Patent No.: 5,954,136. This rejection is respectfully traversed, however independent claim 10 has been amended to clarify aspects of the claim language.

The McHugh reference is relied on as disclosing a tubing system to suspend and power an ESP within a wellbore. However, nothing in the McHugh reference supplements the disclosure of the Moore reference in a manner that would render obvious that which is claimed in amended, independent claim 10. For example, the cited references, taken alone or in combination, do not disclose or suggest positioning an electric cable within a conduit such that the electric cable contacts an interior surface of the conduit at a plurality of locations with "the plurality of locations being positioned to provide uniform support along the length of the conduit" as recited in amended, independent claim 10.

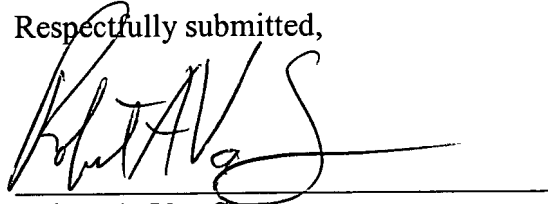
Claims 6, 7, 12, 13, 15 and 16 ultimately depend from one of the independent claims discussed above. These dependent claims are patentable over the cited references for the reasons discussed above with respect to the corresponding independent claims as well as for additional, unique elements found in these dependent claims.

Claim 11 was rejected under 35 USC 103(a) as unpatentable over the Moore reference in view of the McHugh et al. reference and further in view of the Denison et al. reference. This rejection is respectfully traversed. However, claim 11 directly depends from amended, independent claim 10 and is patentable over the Moore reference for the reasons discussed above with respect to independent claim 10 as well as for the additional, unique elements found in claim 11. The McHugh et al. and Denison et al. references provide no additional disclosure that would obviate the deficiencies of the Moore reference.

In view of the foregoing remarks, all pending claims are believed to be in condition for allowance. However, if the Examiner believes certain amendments are necessary to clarify the present claims or if the Examiner wishes to resolve other issues by way of a telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Date: February 12, 2007

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Robert A. Van Someren', written over a horizontal line.

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